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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT OF NEVADA**

DENNIS MONTGOMERY, an individual; and  
MONTGOMERY FAMILY TRUST, a California  
Trust,

Plaintiffs,

vs.

ETREPPID TECHNOLOGIES, L.L.C., a Nevada  
Limited Liability Company; WARREN TREPP,  
an individual; DEPARTMENT OF DEFENSE of  
the UNITED STATES OF AMERICA; and  
DOES 1 through 10,

Defendants.

AND RELATED CASE(S)

Case No. 3:06-CV-00056-PMP-VPC  
**Base File**

3:06-CV-00145-PMP-VPC

**ETREPPID TECHNOLOGIES, L.L.C.  
AND WARREN TREPP'S REPLY IN  
SUPPORT OF MOTION FOR  
SANCTIONS**

**ETREPPID'S AND WARREN TREPP'S REPLY IN SUPPORT OF MOTION FOR  
SANCTIONS**

eTreppid Technologies, LLC and Warren Trepp (collectively "eTreppid") hereby submit their  
Reply in Support of Motion for Sanctions.

1 **I. INTRODUCTION**

2 Montgomery's Opposition to the present Motion for Sanctions is based almost entirely on his  
3 assertion that he has been unable to comply with this Court's February 21, 2008 Order because much  
4 of the information that he was ordered to produce exists only in electronic form, and this was not  
5 ordered to be produced, and (2) eTreppid failed to meet and confer to resolve any issues relating to  
6 Montgomery's failure to provide responsive documents before filing the present motion.

7 Both of these arguments are unavailing. Montgomery's failure to provide virtually any of the  
8 documents that he was ordered to produce cannot be excused by the fact that these documents may be  
9 stored electronically. First, there is simply no reason why Montgomery cannot begin to produce  
10 electronically stored documents – as eTreppid has done – by printing them out and producing hard  
11 copies. Second, the production of many of the subject documents, such as copies of all CDs that are  
12 labeled as belonging to eTreppid, does not require the use of a third party vendor. Third, many of the  
13 documents requested, such as any Agreements between Montgomery and Blixseth and/or Opspring,  
14 almost certainly exist in hard copy form as well as in electronic form. Indeed, although Montgomery  
15 asserts, in his Opposition, that he is not in possession of any paper hard copy documents, he does not  
16 provide any evidence, such as a supporting declaration executed by Dennis Montgomery, to support  
17 this fact.

18 Montgomery's assertion that eTreppid has failed to meet and confer in good faith regarding his  
19 failure to provide responsive documents is likewise unsupportable. Montgomery simply fails to  
20 inform the Court that even after the present motion was filed, counsel for eTreppid asked counsel for  
21 Montgomery, on a number of occasions, when Montgomery would provide responsive documents.  
22 Counsel for Montgomery simply ignored these communications. After refusing to participate in any  
23 meaningful discussions relating to the production of the documents as required by this Court's  
24 February 21, 2008 Order, it is absurd for Montgomery to assert that eTreppid failed to attempt to meet  
25 and confer in good faith.

26 ///

27 ///

28 ///

1 **II. ARGUMENT**

2 **A. eTreppid Attempted In Good Faith to Resolve this Discovery Dispute Both Before**  
3 **and After Filing the Present Motion**

4 As set forth in eTreppid's Motion for Sanctions, on March 18, 2008, prior to filing that Motion,  
5 eTreppid requested that Montgomery inform it of what documents Montgomery intended to produce,  
6 and when Montgomery intended to produce them. Montgomery did not provide this information. *See*  
7 **Exhibit 3** to eTreppid's March 19, 2008 Motion for Sanctions.

8 Since filing that Motion, eTreppid has requested on at least two occasions that Montgomery  
9 provide the additional documents that he was ordered to produce. On March 25, 2008, counsel for  
10 eTreppid sent an eMail to counsel for Montgomery again requesting that Montgomery identify what he  
11 intended to produce, and when he intended to produce it. A true and correct copy of this email is  
12 attached hereto as **Exhibit 1**. Montgomery did not respond to this eMail. On March 28, 2008, counsel  
13 for eTreppid sent counsel for Montgomery a letter again requesting this information. A true and  
14 correct copy of this email is attached hereto as **Exhibit 2**. Montgomery did not respond to this letter.

15 Thus, on at least three occasions, eTreppid attempted to engage in a good faith effort to discuss  
16 a resolution of this dispute – or at least a portion of the dispute – by requesting that Montgomery  
17 identify what he intended to produce, and when such production would be made. Montgomery did not  
18 respond in any way to these attempts at an informal resolution. He cannot seriously assert that  
19 eTreppid failed to attempt such an informal resolution.

20 **B. Montgomery Is Not Relieved of His Duty to Disclose By the Fact that Some**  
21 **Documents Are Stored Electronically**

22 Substantively, Montgomery's Opposition is premised on the notion that no sanctions are  
23 appropriate because Montgomery is currently complying with the February 21, 2008 Order, but that  
24 his compliance has been delayed because, he asserts, the documents at issue are stored electronically.  
25 As Montgomery points out, he has produced a handful of documents since the present motion was  
26 filed. Specifically, Montgomery has produced the following documents in response to this Court's  
27 February 21, 2008 Order:

- 28
  - Copies of Montgomery's tax returns for the years 1998 to 2005.

- 1 • Photocopies of the faces of only 31 of the 167+ CDs that the FBI returned to
- 2 Montgomery in March 2007.
- 3 • A letter purporting to show that Computermate transferred rights in certain copyrights
- 4 to Montgomery.
- 5 • Copies of checks written by Montgomery in partial repayment of a loan made to him by
- 6 Friendly Capital Partners.

7 Montgomery has failed to produce a number of other documents that are the subject of this  
8 Court's February 21, 2008 order. Montgomery asserts that he cannot have produced these documents  
9 yet, because they are stored electronically. As such, Montgomery was waiting for this Court's  
10 determination relative to vendor protocols for electronic discovery prior to production. Because those  
11 protocols were not entered until April 2, 2008, Montgomery asserts, he was unable to provide  
12 responsive documents prior to that time.

13 Montgomery fails to explain why he cannot simply do as eTreppid has done and provide hard  
14 copies of documents that are stored electronically. To date, eTreppid has produced in excess of 13,000  
15 pages of hard copy documents, many of which are printed versions of documents stored electronically.  
16 Montgomery has not even attempted to engage in such an exercise, even though many of the requested  
17 documents – such as any agreements between Montgomery and Opspring and /or Blixseth, and indicia  
18 of payment made pursuant to those agreements – are likely to exist electronically as .pdf files, or  
19 scanned copies of documents. Nonetheless, Montgomery has failed to make any attempt whatsoever  
20 to comply with this Court's February 28, 2008 Order.

21 Moreover, although Montgomery asserts that the documents at issue exist only in electronic  
22 form, he fails to support this assertion with any evidence, such as a Declaration executed by Mr.  
23 Montgomery explaining what information is stored electronically and how long it will take to produce  
24 such information.

25 Moreover, Montgomery has not provided all the hard copy documents that this Court ordered  
26 him to produce. The FBI seized, and returned to Montgomery, more than 160 CDs. Montgomery has  
27 provided copies of the faces of only 31 CDs. Montgomery asserts that he was unable to provide copies  
28 of the rest of the CDs because of "discrepancies between the FBI's seizure inventory list and return

1 inventory list.” However, Montgomery does not explain how these alleged “discrepancies” impact the  
2 question of what CDs were seized and returned.

3 Indeed, a comparison of the search warrant returns with the Inventory of items returned to  
4 Montgomery shows that there is little discrepancy relating to CDs actually seized and returned. The  
5 March 29, 2007 FBI Inventory of items returned to Montgomery (A true and correct copy of which is  
6 attached hereto as **Exhibit 3**) shows that in excess of 160 CDs were returned to Montgomery,  
7 including:

- 8 • “One yellow and gray case containing eTreppid disks – 51 CDs” (Item No. 9);
- 9 • “Thirteen Computer CDs” (Item No. 25);
- 10 • “Sixteen Computer CDs” (Item No. 26);
- 11 • “Three Computer CDs” (Item No. 27);
- 12 • “Seventy-Eight (78) CDs” (Item No. 29).

13 The March 8, 2006 Search Warrant Returns (A true and correct copy of relevant portions of  
14 which are attached hereto as **Exhibit 4**) show that the FBI initially seized the following items:

- 15 • One Yellow/Grey Case containing eTreppid Disks;
- 16 • Seven Compact Disks;
- 17 • One box containing 78 Compact Disks;
- 18 • 15 Computer CDs
- 19 • 16 Computer CDs

20 These two inventories show that there is virtually no discrepancy between what was seized by  
21 the FBI and what was returned to Montgomery. Nonetheless, Montgomery has failed to provide  
22 copies of all but 31 of the CDs seized by the FBI and returned, even though many of the categories of  
23 seized documents match very closely, such as “51 eTreppid CDs” contained in the yellow and grey  
24 case, and the 78 CDs that were contained in a box.

25 In addition, Montgomery has refused to provide copies of the contents of a number of CDs that  
26 are clearly marked as belonging to eTreppid. Montgomery states that he has not done so because the  
27 February 21, 2008 order applies only to hard copy documents. Montgomery implies that this Court  
28 simply ordered Montgomery to provide copies of the contents of these CDs at his leisure. This is, of

1 course, nonsense. When the February 21, 2008 order is read in full, it is clear that this Court intended  
2 that Montgomery be required to provide the copies of the CDs by March 14, 2008. Montgomery made  
3 no effort to do so. Moreover, Montgomery cannot credibly assert that he was unable to provide a copy  
4 of these CDs until a third party vendor was engaged. Simply copying a CD is a trivial matter,  
5 requiring no particular technical expertise. As such, there is simply no basis for Montgomery's refusal  
6 to provide both (1) photocopies of the faces of all CDs seized by the FBI and subsequently returned to  
7 Montgomery, and (2) copies of the contents of all CDs bearing a label that indicates eTreppid  
8 ownership.

9 Montgomery's refusal to provide these CDs is indicative not only of his disdain for that  
10 particular portion of this Court February 21, 2008 order, but also his willful refusal to make a good  
11 faith attempt to comply with the remainder of that order. Accordingly, eTreppid submits that this  
12 Court should view Montgomery's insistence that he has been unable to comply with other portions of  
13 the February 21 order in light of the frivolous nature of Montgomery's excuse for failing to provide the  
14 CDs at issue.

15 **C. The Requested Sanctions Are Appropriate**

16 Montgomery next asserts that, in essence, sanctions are not warranted because (1) eTreppid did  
17 not make a good faith effort to meet and confer before filing the present motion, and (2) eTreppid has  
18 not shown any prejudice from Montgomery's "delay" in producing the ordered documents.

19 Montgomery's first point is obviously specious; as set forth above, eTreppid has engaged in an  
20 extensive effort to meet and confer regarding this dispute. However, Montgomery has continued to  
21 refuse to provide documents that he was ordered to produce, and he has likewise refused to say  
22 whether and when the documents will be produced. Accordingly, Montgomery, and not eTreppid, has  
23 failed to participate in a good faith effort to resolve this dispute informally.

24 Montgomery further implies that his failure to provide the subject documents has not really  
25 prejudiced eTreppid, because this is merely a "delay" in his production. However, even though  
26 Montgomery was order to provide the subject documents on March 14, 2008, he has provided only a  
27 handful of responsive documents, and he has ignored eTreppid's many requests that he commit to a  
28 date by which the production is to take place.

1 For these reasons, the sanctions that eTreppid has requested in this matter are entirely  
2 appropriate, and eTreppid respectfully requests that this Court issue one or more of those sanctions.

3 **III. CONCLUSION**

4 For the foregoing reasons, eTreppid respectfully requests that the present motion be granted.

5  
6 Dated: April 11, 2008.

7 /s/

8 J. Stephen Peek, Esq. (NV Bar #1758)  
9 Jerry M. Snyder, Esq. (NV Bar #6830)  
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26 *eTreppid Technologies, L.L.C. and*  
27 *Cross-Defendant Warren Trepp*  
28

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# PROOF OF SERVICE

I, Cynthia L. Kelb, declare:

I am employed in the **City of Reno, County of Washoe, State of Nevada**, by the law offices of Hale Lane Peek Dennison and Howard. My business address is: **5441 Kietzke Lane, Second Floor, Reno, Nevada 89511**. I am over the age of 18 years and not a party to this action. I am readily familiar with Hale Lane Peek Dennison and Howard's practice for collection of mail, delivery of its hand-deliveries and their process of faxes.

On April 21, 2008, I caused the foregoing **ETREPPID'S AND WARREN TREPP'S REPLY IN SUPPORT OF MOTION FOR SANCTIONS** to be:

X filed electronically with the U.S. District Court and therefore the court's computer system has electronically delivered a copy of the foregoing document to the following person(s) at the following e-mail addresses:

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Seattle, Washington 98101

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on April 21, 2008.

\_\_\_\_\_/s/\_\_\_\_\_  
Cynthia L. Kelb

Hale Lane Peek Dennison and Howard  
5441 Kietzke Lane, Second Floor  
Reno, Nevada 89511

**EXHIBIT “1”**

**EXHIBIT “1”**

**Jerry Snyder**

---

**From:** Jerry Snyder  
**Sent:** Tuesday, March 25, 2008 4:48 PM  
**To:** 'Tuneen E. Chisolm'  
**Cc:** 'Deborah A. Klar'; 'Criss Draper'  
**Subject:** RE: Letter from Jerry Snyder

I have not heard anything further regarding what Montgomery intends to produce and when it will be produced.

Furthermore, please note that the documents produced to date are incomplete. In the February 21, 2008 order, the Magistrate ordered Montgomery to (1) provide a photocopy of the face of each CD seized by the FBI, and (2) produce a copy of every CD the FBI seized, which bears an eTreppid or is understood to be eTreppid property.

You have provided photocopies of the faces of approximately 30 CD's. The Government's March 30, 2007 Detailed Inventory of Property Returned shows that the FBI seized and returned at least 167 CDs. Please provide copies of these remaining CDs.

In addition, a number of the CD's for which you did provide copies clearly bear an eTreppid logo. However, you have not yet provided copies of these CDs.

Please advise as to when this material will be provided.

---

**From:** Tuneen E. Chisolm [mailto:TCHISOLM@linerlaw.com]  
**Sent:** Tuesday, March 18, 2008 3:41 PM  
**To:** Jerry Snyder  
**Cc:** Deborah A. Klar; Criss Draper  
**Subject:** RE: Letter from Jerry Snyder

Jerry: Per my advisement earlier, I had hoped to provide the information you requested below by close of business today, but cannot, as Deborah is in arbitration all day and thus unavailable.

Regarding any documents provided to the media, there are no hard copy documents that we know of so that production has to await the electronic protocols.

I will let you know about anything else as soon as possible. If you reply to this email, please reply to all. Thanks.

---

**From:** Jerry Snyder [mailto:JSnyder@halelane.com]  
**Sent:** Tuesday, March 18, 2008 12:05 PM  
**To:** Tuneen E. Chisolm  
**Subject:** RE: Letter from Jerry Snyder

Please advise as to (1) what Montgomery intends to produce, and (2) when will it be produced.

If you do not confirm, by the close of business today, that Montgomery will provide all documents that he was ordered, on February 21, 2008 order, to produce on or March 14, 2008, then eTreppid will proceed with a motion seeking sanctions for Montgomery's failure to comply with that order.

---

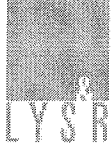
**From:** Tuneen E. Chisolm [mailto:TCHISOLM@linerlaw.com]  
**Sent:** Tuesday, March 18, 2008 11:56 AM  
**To:** Jerry Snyder

4/21/2008

**Cc:** Cynde Kelb; Deborah A. Klar; Criss Draper; Peter Bransten  
**Subject:** RE: Letter from Jerry Snyder

Jerry:

I send this email in response to your letter sent today, purporting to confirm our telephone conversation yesterday afternoon. You are not correct. You asked whether there was another package of documents on the way, and I told you there was not. I DID NOT say that no further production is intended.

**Tuneen E. Chisolm, Esq.**  
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---

**From:** Cynde Kelb [mailto:ckelb@halelane.com]  
**Sent:** Tuesday, March 18, 2008 11:24 AM  
**To:** Tuneen E. Chisolm  
**Subject:** Letter from Jerry Snyder

Please find attached a letter from Jerry Snyder dated March 18, 2008.

<<Letter to Tuneen Chisolm dated 3-18-08.pdf>>

**Cynde Kelb**

Legal Assistant to Jerry Snyder, Esq. and Rob Smith, Esq.  
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4/21/2008

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**EXHIBIT “2”**

**EXHIBIT “2”**

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March 28, 2008

Via eMail and Regular Mail

Tuneen Chisolm, Esq.  
Liner Yankelevitz Sunshine & Regenstreif, LLP  
1100 Glendon Avenue, 14th Floor  
Los Angeles, CA 90024-3503

**Re: eTreppid Technologies and Warren Trepp adv. Montgomery, et al.  
Our File No.: 20801-0002**

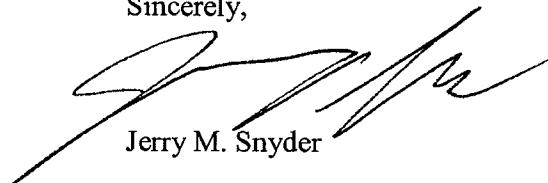
Dear Ms. Chisolm:

It has now been two weeks since the March 14 date by which Montgomery was to provide documents as ordered by the Court on February 21, 2008. I have emailed you on numerous occasions to inquire as to what documents you intend to produce and when you intend to produce them. I have had no response to these attempted communications.

We have received, to date, two letters relating to transfers of interest in some of the copyrights at issue in this case, photocopies of the faces of approximately 30 of the 167+ CDs returned to Montgomery by the FBI, and partial tax returns for the years 2002-2005. Please advise as to when the remaining documents that Montgomery has been ordered to produce will be produced.

In addition, you advised on Wednesday that your contact person at IKON no longer worked there. As a result, I advised that either of the other two neutrals that you suggested were acceptable. To date, you have not informed me of the name of either of these individuals, nor have you made any effort to contact them. Please advise as to how you wish to proceed.

Sincerely,



Jerry M. Snyder

**HALE LANE PEEK DENNISON AND HOWARD**

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CARSON CITY OFFICE: 777 East William Street | Suite 200 | Carson City, Nevada 89701 | Phone (775) 684-6000 | Facsimile (775) 684-6001

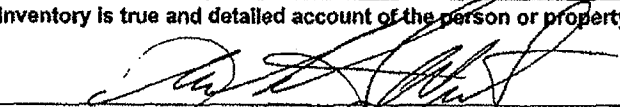
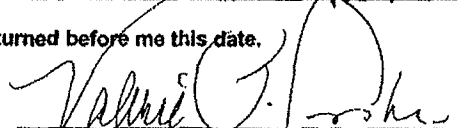
::ODMA\PCDOCS\HLR\NODOCS\728995\1



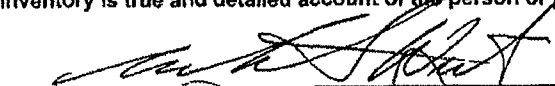
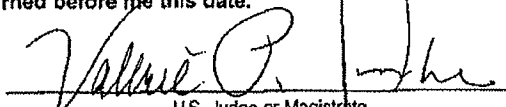
**EXHIBIT “3”**

**EXHIBIT “3”**

AO 83 (Rev. 2/90) Search Warrant

RETURN		
DATE WARRANT RECEIVED 3/3/2006	DATE AND TIME WARRANT EXECUTED 3/3/2006 6:42pm	COPY OF WARRANT AND RECEIPT FOR ITEMS LEFT WITH Locked inside unit 140
INVENTORY MADE IN THE PRESENCE OF SA MICHAEL WEST AND SA GLEN BORTH		
INVENTORY OF PERSON OR PROPERTY TAKEN PURSUANT TO THE WARRANT		
<ol style="list-style-type: none"><li>1. ONE YELLOW/GREY CASE containing eTrappid disks.</li><li>2. SEVEN Compact disks.</li><li>3. NINE MINI DV VIDEO CASSETTES.</li><li>4. ONE Sony Hi8 VIDEO CASSETTE.</li><li>5. ONE USB (BLACK 2.0 FLASHBACK)</li><li>6. ONE 256MB SANDISK COMPACT FLASH CARD</li><li>7. ONE IBM TRAVEL STAR HARD DRIVE SN/V29CH7080N5</li><li>8. ELEVEN SEALED WESTERN DIGITAL HARD DRIVES.</li><li>9. ONE TDK MINI DV VIDEO CASSETTE.</li><li>10. TEN VARIOUS MANUFACTURER HARD DRIVES</li><li>11. ONE BOX CONTAINING 78 compact disks.</li><li>12. BANK STATEMENTS DEC'05 &amp; JAN'06</li><li>13. FINANCIAL DOCUMENTS &amp; phone bills</li><li>14. ONE REMOVABLE hard drive labeled "Dennis Eyes Only" &amp; ONE compact disk labeled eTrappid.</li></ol>		
CERTIFICATION		
I swear that this inventory is true and detailed account of the person or property taken by me on the warrant.		
		
Subscribed, sworn to, and returned before me this date.		
 Valerie G. Foster U.S. Judge or Magistrate		3/8/06 Date

AO 93 (Rev. 2/90) Search Warrant

RETURN		
DATE WARRANT RECEIVED 2/28/2006	DATE AND TIME WARRANT EXECUTED 3/1/2006 12:08pm	COPY OF WARRANT AND RECEIPT FOR ITEMS LEFT WITH Attorney ERIC PULVER
INVENTORY MADE IN THE PRESENCE OF Attorney ERIC PULVER		
INVENTORY OF PERSON OR PROPERTY TAKEN PURSUANT TO THE WARRANT		
<ol style="list-style-type: none"><li>1. HP Pavilion DV1000 SN/CNFS422H63 Notebook w/Power cord.</li><li>2. SIX SanDisk Compact Flash Cards</li><li>3. LETTER on white Paper and YELLOW PAGES ripped up paper.</li><li>4. Rolodex</li><li>5. 15 Compact disks</li><li>6. White Shredded paper.</li><li>7. Misc. Post-it Notes.</li><li>8. Network Solutions Account paperwork, 4 pages.</li><li>9. Check Stubs - Montgomery Family Trust.</li><li>10. WESTERN Digital Hard Disk Ser# WEAL 71844911</li><li>11. Granite Digital - "DENVER" 12/17/2005 SN/F050906S0042A</li><li>12. Silver CPV(TOWER) LABELED AT13</li><li>13. 16 Compact Disks.</li><li>14. Three pieces of paper containing phone numbers</li><li>15. Granite Digital Server labeled "DEO 01/20/06 PROG"</li><li>16. Prescription drugs with <u>No prescription</u> MADE in INDIA<ol style="list-style-type: none"><li>A. Alipex 42 Tablets .25mg</li><li>B. Edicifrox 40 Tablets 500mg</li><li>C. Valium 10 168 Tablets 5mg</li><li>D. Carisoma 190 Tablets 350mg</li><li>E. Azithromycin 78 Tablets 500mg</li><li>F. Edicifrox 100 Tablets 500mg</li><li>G. Zolfresh 5 100 Tablets 5mg</li></ol></li></ol>		
CERTIFICATION		
I swear that this inventory is true and detailed account of the person or property taken by me on the warrant.		
		
Subscribed, sworn to, and returned before me this date.		
 U.S. Judge or Magistrate		3/8/06 Date

**EXHIBIT “4”**

**EXHIBIT “4”**

597 (Rev 8-11-94)

Page 1 of 4

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released/Seized

File # 295A-LV-39368

On (date) March 29, 2007

item(s) listed below were:

- ☐ Received From  
☒ Returned To  
☐ Released To  
☐ Seized

(Name) Dennis L. Montgomery  
(Street Address) \_\_\_\_\_  
(City) Reno, NV

Description of Item(s):

Serial # LOCAL 75167504

- #1 One Silver Lion LI Tower serial # no serial # Dennis Home 9/17/05  
E03968082. No hardware in case for (1) 3.5 floppy disk in drive no serial #  
#2 E03968075 One HP Pavilion DV 1000, SW/CNF54221167, Network card  
powered  
#3 E03968079 Granite Digital - User server Labeled 12/17/05 serial #  
F05090650042A with 2 hard drives serial # WMAMR166612  
serial # WMAMR1509972  
#4 E03968081 One Granite Digital Server Labeled 1/20/06 Log with  
2 hard drives serial # WMAMR1537929, serial # WMAMR1523649  
#5 E03968126 One Western Digital 300GB serial # WMAMR1420949 containing  
evidence derived from HP Pavilion Notebook 30GB Hitachi Hard drive  
serial # 08K0864  
#6 E03968118 One Maxtor 300GB Hard drive serial # 6608L72H  
containing evidence derived from custom tower Western Digital 250GB  
Hard drive serial # LOCAL 75167504  
#7 Seven sealed 160GB digital hard drives SN# WMAMR1539542,  
SN# WMAMR1624507, SN# WMAMR1671681, SN# WMAMR1538581, SN# WMAMR1539825,  
SN# WMAMR1538197, SN# WMAMR1612253, SN# WMAMR1580671,  
SN# WMAMR1530666, SN# WMAMR1535570, SN# WMAMR1543003

Received By:

(Signature)

Received From:

(Signature)

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released/Seized

File # 295A-LV-39368

On (date) March 29, 2007

item(s) listed below were:  
☒ Received From  
☒ Returned To  
☐ Released To  
☐ Seized

(Name) Dennis L. Montgomery  
(Street Address) \_\_\_\_\_  
(City)  Reno, NV

Description of Item(s):

- #8 ED3968102 Seagate 30.6 GB SN#3CK028W3, Seagate 30.6 GB Hard drive  
SN#3CK00XXY, Western Digital 40GB Hard drive SN#WMAU15194737,  
Western Digital 120GB Hard drive SN#WMA1SC12L3396, Western Digital 40GB Hard drive  
SN#WMAU15256807, Western Digital 40GB Hard drive SN#WCAU16502878,  
Western Digital 40GB Hard drive SN#WMAU16644525, Western Digital 40GB  
Hard drive SN#WMAU15335294, Western Digital 40GB Hard drive SN#WCAU13691218,  
Western Digital 120GB Hard drive SN#WMA1SC3243070
- #9 ED3968102 One Yellow and Grey Case Containing 2 Floppy disks - 5 1/4"
- #10 ED3968080 Western Digital 250 GB SN#WMA171844911
- #11 ED3968089 One Removable Western Digital 60 GB SN#WMA1611111111111111  
One DVD disk Enigma - Dennis, Western, Georgia 7/11/02
- #12 ED3968099 3 DVDs and 2 compact disks, X5 DAE, K2 K02-BUAGV-KP636-DJ77X  
-HD 28, XYZ Frames 6/11/04, Black Tea 11/10/03, Black Tea 12/20/03
- #13 ED3968098 Sony Mini DV Tape Labeled "7/11/05 31 and 60 D"  
SN# 04HC4113 = 3211
- #14 ED3968097 Two DVDs Labeled "Lance Armstrong" and "Lance Armstrong"  
Enigma Eyes Only
- #15 ED3968092 Sony Mini DV Tape Labeled "Multiple Human & Weapons IR Test"  
One photo labeled "Multiple Human & Weapons IR Test" \*

Received By: Dennis L. Montgomery  
(Signature)

Received From: [Signature]  
(Signature)

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released/Seized

File # 295A-LV-39368

On (date) March 29, 2007

item(s) listed below were:

- ☐ Received From  
☒ Returned To  
☐ Released To  
☐ Seized

(Name) Dennis L. Montgomery  
(Street Address) \_\_\_\_\_  
(City) Gen, NV

Description of Item(s):

- #16 EO 3968091 Sony Mini DV Tape Labeled "Teit People 12/14/15"  
SN# 06HC4228F 2903, one photo labeled "Teit People 12/14/15" \*
- #17 EO 3968088 Sony Mini DV Tape labeled "07/07/05 Blind 180"  
SN# 02HC4226F 2718, one photo labeled "07/07/05 Blind 180" \*
- #18 EO 3968057 Sony Hi8MP 8mm camcorder SN# F4404099, Black USB  
Memory Stick SN# 030722-00092, One 256mb SanDisk Compact Flash
- #19 EO 3968036 One TBM Travel Star Hard drive SN# V25CH7080N5
- #20 EO 3968055 One TDK Mini DV Tape SN# AADJ218
- #21 EO 3968050 Five Mini DV video cassettes - JVC mini DV, Panasonic  
DV# APTDP8-03, Sony Mini DV SN# 521A191A000457, Sony Mini DV  
SN# 53113490300159, Sony Mini DV SN# 53A11950700007 labeled "Pete  
Weissman"
- #22 EO 3968034 Bank Statements from Dec 05 and Jan 06 (2 from Wells Fargo,  
1 from Bank of America)
- #23 EO 3968093 Financial Documents and Cell Phone bills
- #24 EO 3968083 1) letter on white paper; yellow piece of ripped up paper  
2) Rolodex 3) white shredded paper, 4) 17 or 18 Post it notes, 5) Network Solutions  
near laptop work four pages, 6) Check Stub - Montgomery, Family Trust  
7) three pieces of paper containing phone numbers

Received By: [Signature]  
(Signature)

Received From: [Signature]  
(Signature)



FD-597 (Rev 8-11-94)

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UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released/Seized

File # 295A-LV-39368

On (date) March 29, 2007

item(s) listed below were:

☐ Received From  
☒ Returned To  
☐ Released To  
☐ Seized

(Name) Dennis L. Montgomery  
(Street Address) \_\_\_\_\_  
(City) Reno, NV

Description of Item(s): \_\_\_\_\_

#15 ED3968078 THIRTEEN (13) Computer CD's  
#26 ED3968094 SIXTEEN (16) Computer CD's  
#27 ED3968076 THREE (3) Computer CD's  
#28 ED3968076 FIVE (5) San Disk Compact Flash Cards, One (1) Lexar Compact Flash Card.  
#29 ED3968103 SEVENTY-EIGHT (78) CD's  
\* = THREE (3) still images taken from three (3) DV Tapes, items  
15, 16, and 17 on this inventory list, to determine content of DV Tapes.  
These images were not seized by the FBI. They were copied by the FBI.

Received By: [Signature]  
(Signature)

Received From: [Signature]  
(Signature)

FD-597 (Rev 8-11-94)

Page 1 of 1

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released/Seized

File # 295A-LV-39368

On (date) April 6, 2007

item(s) listed below were:

- ☐ Received From  
☒ Returned To  
☐ Released To  
☐ Seized

(Name) Dennis Lee Montgomery

(Street Address) \_\_\_\_\_

(City) Reno, NV

Description of Item(s):

#1 ED3968096 Alipex 0.25 43 tablets, Valium 10 108  
tablets, Valium 5 <sup>60</sup> 58 tablets, Zofresh 5 100 tablets,  
Carisoma Tablets 350mg 190 tablets

#2 ED3968095 Edicitox-500mg 140 tablets, Azithromycin  
500mg 78 tablets

Received By: Emil [Signature]  
(Signature)

Received From: [Signature]  
(Signature)